

February 13, 2006

U.S. Department of Agriculture Agricultural Marketing Service
Fruit and Vegetable Programs, Fresh Products Branch
Standardization Section
1400 Independence Ave., SW.
Room 1661 South Building – Stop 0240
Washington, DC 20250-0240

Federal Register: January 24, 2006
Docket Number FV-06-304, Pages 3818-3819

Established in 1911, the California Grape & Tree Fruit League (League) is a nonprofit statewide industry trade association representing growers, packers, shippers, and exporters of table grapes and deciduous tree fruit. The League's members collectively account for about 85 percent of the total production of table grapes in California.

At the request of the Fresh Fruit and Vegetable Industry Advisory Committee of USDA's Agricultural Marketing Service, the League and its membership have reviewed the U.S. Table Grape Grade Standards and have submitted a petition to amend the current standard.

The League has worked through an ad hoc committee along with other interested industry participants to identify areas in which recommendations might be made to improve table grape grade standards.

The petitioned adjustment to shatter reflects how shatter is currently scored and recognizes that the evolution of different containers, such as bags and clamshells, have resulted in less shrinkage and more saleable product to consumers. California's table grape producers funded consumer surveys, which measured that 81 percent of surveyed consumers rated grapes with 10-percent shatter as good to excellent and with no negative impact to retailers or consumers.

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The industry's petition identifies the need to amend the grape standards in that a fixed percentage of shatter such as 10 percent does not in reality result in less saleable product or negative attitudes from consumers and thus should not count toward total defects within non-plain pack containers such as bags and clamshells. This amendment will only apply to inspections at receiving point and will not create an additional allowance from point of shipment.

Our membership wishes to express support for the petition filed by the California Grape & Tree Fruit League to amend the United State's Standards for Grades of Table Grapes (European or Vinifera Type), as last reviewed in 1999. The League enthusiastically supports the petitioned amendment in an effort to make the grade standards more consistent with current packaging practices and consumer buying practices.

The League appreciates the opportunity to participate within the revision of the table grape standards, and the industry looks forward to the benefits from the implementation of amending the current standard. If you have any questions, please do not hesitate to contact me at (559) 226-6330.

Sincerely,

Barry Bedwell, President
California Grape & Tree Fruit League